

REMARKS

Claims 80-84, 87-92, 94-99, 102-107, 109-114, 117-122, 124, and 125 were pending and claims 1-23 were withdrawn when last examined. By the present Response, applicants amend claims 80, 96, and 111. No new matter has been added. Support for the amendment can be found at least in FIGS. 1 and 2, and the corresponding description in the specification.

Claim Rejections – 35 USC § 112

The Examiner rejected claim 96 under 135 U.S.C. § 112(2). According to the Examiner, the term “tangibly” in claim 96 is a relative term which renders the claim indefinite. By the present amendment, the term “tangibly” has been removed from claim 96. Thus, applicants respectfully submit that this rejection is moot and should be withdrawn.

Claim Rejections – 35 USC § 102

Claims 80-84, 87-92, 94-99, 102-107, 109-114, 117-122, 124-125 were rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,758,259 to Lawler (“Lawler”). Applicants respectfully traverse the rejections.

Claim 80, as amended, recites a method implemented by an apparatus. The method includes receiving one or more group descriptions from a server about digital broadcast, where each of the one or more group descriptions describes actual content elements common in each member of a respective group of multimedia objects and includes a title for the respective group and a group identifier that is a distinct element of the group description and identifies the respective group of multimedia objects. The group identifier and at least a portion of each of the one or more group descriptions are stored in the apparatus. A first content description and a first group description are received from the server. The first content description describes content in a first multimedia object and includes (i) a title for the first multimedia object, (ii) a first object identifier that identifies the first multimedia object, and (iii) a first group reference that includes a first group identifier to identify a first group of multimedia objects to which the first multimedia object belongs, wherein the first group description describes actual content elements common in each member of the first

group of multimedia objects and includes at least a title for the first group of multimedia objects. The first group identifier is compared with the group identifier of each respective group of the one or more previously stored group descriptions if the first multimedia object is displayed on a display terminal of the apparatus. If the first group identifier is different from the previously stored group identifiers, the first group identifier and at least a portion of the first group description about the actual content elements common in each member of the first group of multimedia objects are stored in the apparatus.

Lawler, as discussed in the Prior Art section of the Present Application, discloses an interactive television ("IT") system for providing program guide to a user based on the user's preferences. *See* Present Application at 2:21-25 and Lawler's Abstract. Lawler, however, fails to disclose receiving one or more group descriptions from a server about digital broadcast and storing at least a portion of the one or more group descriptions in the apparatus, where each of the one or more group descriptions describes actual content elements common in each member of a respective group of multimedia objects.

First, contrary to the Examiner's assertion, Lawler's "personal preference," "household preference," "national preference," and "critics preference" shown in FIG. 3B do not correspond to the claimed group descriptions. *See* Office Action at 3. Instead of describing preferences, the claim explicitly requires that each of the group descriptions describes actual content elements that are common in each member of the respective group of multimedia objects. For example, the Personal Favorites Profile (TABLE 2), which is used to generate Lawler's "personal preference," includes a list of actors with different preference values. Lawler, however, fails to disclose that all those actors are common in each member of a respective group of multimedia objects. Lawler at col. 8:5-34.

Second, Lawler discloses that "programming data representing predetermined characteristics of programming scheduled for transmission over IT system 10 is stored in central control node 12." Lawler at col. 5:66 to col. 6:2. Although Lawler also discloses that the programming data stored at the central node 12 can include a "series table of data representing selected characteristics of each interactive or broadcast television series" (col. 6:14-16), it fails to disclose receiving the claimed group descriptions from a server about

digital broadcast and storing at least a portion of those group descriptions in the apparatus. Indeed, Lawler's system not just stores, but also processes the programming data in the central node. *See, e.g.*, FIG. 1 and col. 7:54-61. Instead of a server like Lawler's central node, the method of the claim is performed by the apparatus which receives the group descriptions from the server (and has a display terminal for displaying the first multimedia object).

For at least the above reasons, claim 80 should be allowed. Claims 81-84, 87-92, 94 and 95 depend from claim 80, and are allowable for at least the same reasons.

Independent claims 96 and 111 recite a computer program product and a system, respectively, and require, in part, limitations that are similar to those discussed above with reference to claim 80. As Lawler fails to disclose those limitations, claims 96 and 111 also should be allowable. Claims 97-99, 102-107, 109, 110, 112-114, 117-122, 124, and 125 are dependent claims that are allowable for at least the same reasons as their respective base claims.

CONCLUSION

Applicants respectfully request that the pending claims be allowed and the case passed to issue. Should the Examiner wish to discuss the Application, it is requested that the Examiner contact the undersigned at (415) 772-7493.

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6/13/2008

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